IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

)) Chapter 11
) Case No. 24-90377 (MI)
) (Jointly Administered)) Re: Docket No. 411

CERTIFICATE OF COUNSEL REGARDING DEBTORS' MOTION FOR ENTRY OF AN ORDER (I) ESTABLISHING PROCEDURES FOR SALES, TRANSFERS, AND ABANDONMENT OF DE MINIMIS ASSETS; AND (II) GRANTING RELATED RELIEF

Pursuant to the *Procedures for Complex Cases in the Southern District of Texas*, counsel to the above-captioned debtors and debtors in possession (collectively, the "**Debtors**") certifies as follows:

- 1. On July 2, 2024, the Debtors filed the *Debtors' Motion for an Entry of an Order (I)*Establishing Procedures for Sales, Transfers, and Abandonment of De Minimis Assets; and (II)

 Granting Related Relief [Docket No. 411] (the "Motion"). The Motion attached a proposed form of order [Docket No. 411-1] (the "Proposed Order").
- 2. The deadline for parties to file objections and responses to entry of a final order on the Motion was July 23, 2024 (the "**Objection Deadline**").
- 3. Counsel to the Debtors received informal comments from Gelco Fleet Trust, as successor to Element Fleet Corporation f/k/a Gelco Corporation ("Element Fleet"), Chubb

The last four digits of Zachry Holdings, Inc.'s tax identification number are 6814. A complete list of each of the Debtors in these chapter 11 cases and the last four digits of their federal tax identification numbers may be obtained on the website of the Debtors' claims and noticing agent at www.veritaglobal.net/ZHI. The location of the Debtors' service address in these chapter 11 cases is: P.O. Box 240130, San Antonio, Texas 78224.

Insurance Companies and Zurich Insurance Companies. No objections or responses to the Initial Proposed Order were filed on the docket on or before the Objection Deadline.

- 4. The revised proposed order (the "Revised Proposed Order") attached hereto incorporates the comments from Element Fleet, Chubb Insurance Companies, and Zurich Insurance Companies.
- 5. A redline reflecting the changes between the Revised Proposed Order and the Proposed Order is attached hereto as **Exhibit A**.
 - 6. The Debtors request that the Court enter the Revised Proposed Order.

Dated: July 24, 2024 Houston, Texas

/s/ Charles R. Koster

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Counsel to the Debtors and Debtors in Possession

Certificate of Service

I certify that on July 24, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster
Charles R. Koster